

### REMARKS

Applicant acknowledges the indication in the Office Action that claims 5-8 and 18-20 would be allowable if rewritten in independent form. However, with the present amendment of claim 1, Applicant now believes that all of the claims are now allowable in view of the reasons present herein.

With reference to the Office Action, claims 1 and 2 stand rejected under 35 U.S.C. 102(b) as being anticipated by US Patent No. 4,501,413 to Illmann et al. This rejection is traversed in view of the amendment to claim 1 for the following reasons.

The Examiner indicates that the clamps of Illmann et al. “can be seen to be normally in the closed position as the design includes helical springs (located under the cams) which must be extended in order for the clamps to be released (col. 3 ln 30-32[sic - should be ln 20-22]). Since it is understood that the normally biased position of the mechanism is when the components are in their relaxed state, in this case closed.”

However, it is to be noted that when the device of Illmann et al. is in its closed position, the clamps are themselves individually biased towards an open unclamped position by way of springs 9 which are used to impart a restoring force for unclamping (see col. 2, line 67-col. 3, line 1). Thus, while the system of Illmann might ultimately be biased into a closed clamping position, it is clear that the clamps themselves are not individually normally biased towards a closed position. Thus, the clamps of Illmann et al. are either biased together as a group towards a closed position by virtue of the system bias or are individually biased towards an open unclamping position.

Applicant’s device differs from that of Illmann et al. in that its clamping mechanisms are individually biased towards a closed position (see page 18, lines 18-19 and page 19, line 1) as

now recited in claim 1, regardless of whether or not the device itself is biased in a closed position (see page 5, lines 20-22). In this manner, should the system bias (if any) fail, panels retained within the clamping mechanisms will remain retained therein and, similarly, should the bias of any one clamping mechanism fail, the individual biasing ensures that the panels in the remaining clamping mechanisms remain secured. Thus, it can be seen that the provision of individually biased clamping mechanisms acts as a safety feature in Applicant's device.

Should the system bias fail in Illmann et al., for example if the helical springs (located under the cams) were to fail when the clamps were in their clamped position, the restoring force of the helical springs 9 would act against the wedge-shaped elements 7 causing the clamps to open and the products therein to be released. Applicant's device on the other hand does not require an additional system bias to retain the clamps in their clamping state as is the case with Illmann et al. as each clamp is individually biased towards a closed position.

Furthermore, having to provide an additional system bias to retain the clamps which are otherwise biased open in their clamping state necessarily requires more energy to overcome the system bias to open the clamps than a system such as Applicant's which simply has individually closed-biased clamps.


Accordingly, Applicant respectfully submits that claim 1 as amended is neither anticipated by Illmann et al. nor is rendered obvious in view of the other cited references and a favorable reconsideration to this end is earnestly solicited. Claim 2 includes all of the limitations of amended claim 1 which patentably distinguishes over Illmann et al. for the reasons given above and, accordingly, claim 2 is believed to patentably distinguish over Illmann et al. within the meaning of 35 U.S.C. §102.

Dependent claims 3 and 4 include all the limitations of amended claim 1 and claim 2, which are believed to patentably distinguish over Illmann et al. for the reasons given above. Accordingly, claims 3 and 4 are believed to patentably distinguish over Illmann et al. in view of the cited reference to Burns (U.S. Patent No. 2,471,606) within the meaning of 35 U.S.C. §103.

Finally, dependent claims 16 and 17 include all the limitations of amended claim 1 which is believed to patentably distinguish over Illmann et al. for the reasons given above. Accordingly, claims 16 and 17 are believed to patentably distinguish over Illmann et al. in view of the cited reference to Pride (U.S. Patent No. 6,102,206) within the meaning of 35 U.S.C. §103.

In view of the foregoing, Applicant respectfully submits that the application is now in condition for allowance. Accordingly, favorable reconsideration of the application is respectfully requested.

Respectfully submitted,

By:   
J. Andrew McKinney  
Reg. No. 34,672

**Customer No. 23294**  
JONES, TULLAR & COOPER, P.C.  
P.O. Box 2266, Eads Station  
Arlington, VA. 22202  
(703) 415-1500  
Dated: February 21, 2006